

EXHIBIT E

From: Russell.Mangas@lw.com <Russell.Mangas@lw.com>
Sent: Wednesday, May 10, 2023 12:18 PM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; SKYRYSEMOOG.LWTEAM@lw.com
Cc: grant.gelberg@halpernmay.com; scott.tenley@zfzlaw.com; catherine.thompson@halpernmay.com; alyssa.titche@halpernmay.com; ben.heller@zfzlaw.com; rachel.fiset@zfzlaw.com
Subject: RE: Moog/Skyryse - Bandemer Declaration

Kazim,

Thanks for your time on the phone today. As you have seen in the attached email, iDS has confirmed that it inadvertently failed to load the fourth VSC that Mr. Bandemer reviewed and that Skyryse requested iDS to load for Moog's review. iDS has indicated it will load that fourth VSC for Moog's review. Once you have had the opportunity to review, please let us know if you have any further questions.

You have also likely seen that Skyryse produced the Reid Raithel logs to Moog today, and I identified the Bates number of the Google Drive file referenced in paragraph 39 of Mr. Bandemer's report last night. I believe Moog should now have everything it needs (pending iDS's upload of the fourth VSC), but please let us know if that is not correct.

Thanks,

Russell Mangas

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From: Kazim Naqvi <KNaqvi@sheppardmullin.com>
Sent: Wednesday, May 10, 2023 11:55 AM
To: Mangas, Russell (CH) <Russell.Mangas@lw.com>; #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>
Cc: grant.gelberg@halpernmay.com; scott.tenley@zfzlaw.com; catherine.thompson@halpernmay.com; alyssa.titche@halpernmay.com; ben.heller@zfzlaw.com; rachel.fiset@zfzlaw.com
Subject: RE: Moog/Skyryse - Bandemer Declaration

Russell:

Thanks for your e-mail. There is still some confusion on the VSC issue.

Can you please confirm that the "four volumes reviewed by Mr. Bandemer" are the four listed in my e-mail below:

- MOOOG-04208.E0039.VSC_1
- MOOOG-04208.E0039.VSC_2
- MOOOG-04208.E0039.VSC_3
- MOOOG-04208.A0039.VSC_Email

If there is another VSC that Mr. Bandemer relied upon, we need to know that and Skyrise needs to identify it by name/path. If the above list is complete, then our understanding of the issue is that Skyrise claims that "MOOOG-04208.A0039.VSC_Email" is a complete volume shadow copy, whereas our understanding is that "MOOOG-04208.A0039.VSC_Email" is not a complete volume shadow copy and is a single PST file. Can you please confirm that is the issue? If so, then we do not object to having FTI communicate directly with iDS to ensure that "MOOOG-04208.A0039.VSC_Email" is extracted correctly and to ensure that Moog gets access to the complete volume shadow copy.

Please let us know as soon as possible. If it would be easier to discuss on the phone, let me know your availability today.

Thanks,
Kazim

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From: Russell.Mangas@lw.com <Russell.Mangas@lw.com>
Sent: Wednesday, May 10, 2023 5:49 AM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; SKYRYSEMOOG.LWTEAM@lw.com
Cc: grant.gelberg@halpernmay.com; scott.tenley@zfzlaw.com; catherine.thompson@halpernmay.com; alyssa.titche@halpernmay.com; ben.heller@zfzlaw.com; rachel.fiset@zfzlaw.com
Subject: RE: Moog/Skyrise - Bandemer Declaration

Kazim,

We have confirmed that all four volumes reviewed by Mr. Bandemer are complete volume shadow copies. If it would be helpful, Skyrise is willing to have FTI communicate with iDS to ensure that iDS is extracting those volume shadow copies correctly. Please let us know if you would like us to do that and, if so, whether Moog will consent to FTI communicating ex parte with iDS for this purpose.

Regarding Mr. Wang's Google Drive, paragraph 39 of Mr. Bandemer's report refers to two files. One is a computer artifact, which had been sent to the recycle bin on Mr. Wang's laptop. That artifact referred to a file path location on Mr. Wang's Google Drive. The Bates # for the file on Mr. Wang's Google Drive is SKY_00127905.

The Daily.out logs from Mr. Raithel's Mac computer will be produced today in a separate email.

Thanks,

Russell Mangas

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From: Kazim Naqvi <KNaqvi@sheppardmullin.com>

Sent: Tuesday, May 9, 2023 12:54 AM

To: Mangas, Russell (CH) <Russell.Mangas@lw.com>; #C-M SKYRYSE - MOOG - LW TEAM
<SKYRYSEMOOG.LWTEAM@lw.com>

Cc: grant.gelberg@halpernmay.com; scott.tenley@zfzlaw.com; catherine.thompson@halpernmay.com; alyssa.titche@halpernmay.com; ben.heller@zfzlaw.com; rachel.fiset@zfzlaw.com

Subject: RE: Moog/Skyryse - Bandemer Declaration

Russell:

We have looked into the issues set forth in your e-mail below.

On the VSCs issue, a VSC is a complete directory structure of the drive. VSCs 1-3 referenced in my May 1 e-mail are complete directory structures. What Skyryse is labeling as "VSC_4" only has a single PST file, and is not an image like VSCs 1-3. "VSC_4" is therefore not a true Volume Shadow Copy. This is the source of our confusion. Please confirm that Mr. Bandemer did not rely on anything that he refers to as a "Volume Shadow Copy" other than the following:

- MOOOG-04208.E0039.VSC_1
- MOOOG-04208.E0039.VSC_2
- MOOOG-04208.E0039.VSC_3
- MOOOG-04208.A0039.VSC_Email

On the issue related to Mr. Wang's Google Drive, your e-mail states: "Skyryse has produced both of those files and their associated metadata to Moog." So that there is no ambiguity, we request that you identify these files by bates number.

On the final issue related to Mr. Raithe's laptop, your e-mail states: "Skyryse will produce these logs to Moog." No such logs have been produced, and we request that they be produced immediately. Moog reserves the right to request additional discovery, including the production of Mr. Raithe's laptop (or portions thereof), after reviewing the logs.

All rights are reserved.

Thank you,
Kazim

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From: Russell.Mangas@lw.com <Russell.Mangas@lw.com>

Sent: Thursday, May 4, 2023 3:52 PM

To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; SKYRYSEMOOG.LWTEAM@lw.com

Cc: grant.gelberg@halpernmay.com; scott.tenley@zfzlaw.com; catherine.thompson@halpernmay.com; alyssa.titche@halpernmay.com; ben.heller@zfzlaw.com; rachel.fiset@zfzlaw.com

Subject: RE: Moog/Skryse - Bandemer Declaration

Counsel:

On May 1, iDS confirmed that all four volume shadow copies (VSCs) identified in Mr. Bandemer's report were made available to Moog on April 27. It appears Moog's claim that it could not access Volume 4 was in error and Moog confirmed on May 2 that it does have access to all four VSCs. The creation dates for the VSCs, which should also be viewable to Moog based in the produced material, are 04/05/2022 19:48, 04/05/2022 23:15, 04/06/2022 15:57, and 04/06/2022 17:19.

As Mr. Bandemer explained in his report, he matched the file identified in paragraph 39 of his declaration to one of the previously deleted files by comparing the metadata of those files (e.g., file name, created date, modified date, last accessed date, file size). Skryse has produced both of those files and their associated metadata to Moog. We understand that information is sufficient to allow Moog's expert to test Mr. Bandemer's conclusions and there is no additional, relevant data from Mr. Wang's Google Drive that Moog is entitled to. If Moog believes there is some additional, relevant data that is necessary to test Mr. Bandemer's conclusions, please let us know and we are happy to meet and confer.

Mr. Bandemer's conclusions in paragraph 52 are based on his review of the Daily.out logs from Mr. Raithel's Mac computer. Skryse will produce these logs to Moog. If Moog believes there is some additional, relevant data that is necessary to test Mr. Bandemer's conclusions, please let us know and we are happy to meet and confer.

Thanks,

Russell Mangas

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From: Kazim Naqvi <KNaqvi@sheppardmullin.com>

Sent: Monday, May 1, 2023 8:55 PM

To: #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>

Cc: grant.gelberg@halpernmay.com; scott.tenley@zfzlaw.com; catherine.thompson@halpernmay.com; alyssa.titche@halpernmay.com; ben.heller@zfzlaw.com; rachel.fiset@zfzlaw.com

Subject: Moog/Skryse - Bandemer Declaration

Counsel:

We write to request the prompt production of various files and data sources relied upon by Mr. Bandemer in his declaration but which have not been produced or otherwise made available for Moog's review.

First, in Paragraph 17, Mr. Bandemer states: "BRG identified 4 volume shadow copies on Mr. Wang's Skyrise computer; the earliest volume shadow copy was created on April 5, 2022." To our understanding, only the following 3 volume shadow copies have been produced from Mr. Wang's Skyrise computer:

- MOOOG-04208.E0039.VSC_1
- MOOOG-04208.E0039.VSC_2
- MOOOG-04208.E0039.VSC_3

If the fourth volume shadow copy referenced by Mr. Bandemer has been produced, please identify it. If it has not been produced, we request that it be produced promptly. Please also provide/identify the creation dates of all four volume shadow copies at issue.

Second, in Paragraph 39, Mr. Bandemer states: "I located a copy of this file on Mr. Wang's Google Drive. See supra ¶ 31." To our understanding, Mr. Wang's Google Drive data has not been produced either to iDS or to Moog. It must be produced promptly.

Finally, in Paragraph 52, Mr. Bandemer states: "I reviewed the logs on Mr. Raithel's Skyrise laptop that record the disks and volumes connected to it." Mr. Raithel's Skyrise laptop has not been made available for review, nor have any logs related to the laptop. We request that a forensic image of Mr. Raithel's entire Skyrise laptop be promptly produced. As you know, when Skyrise made a similar request for the production of Tri Dao's Moog laptop, Moog produced a forensic image of the entire laptop.

Moog reserves the right to identify additional materials which were relied upon by Mr. Bandemer but have not been produced. We request that all the foregoing materials be made available for Moog's review before the end of the week. Please confirm.

Thank you,
Kazim

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